

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

_____	x	
	:	<b>Chapter 11</b>
<b>In re:</b>	:	
	:	<b>Case No. 08-13555 (SCC)</b>
<b>LEHMAN BROTHERS HOLDINGS INC., et al.,</b>	:	
	:	
<b>Debtors.</b>	:	
_____	x	

**STIPULATION FOR ADJOURNMENT OF THE HEARING ON  
MOTION OF DEBTORS FOR INDEMNIFICATION ADR ORDER  
WITH RESPECT TO PLAZA HOME MORTGAGE INC.**

This Stipulation is entered into by and between Lehman Brothers Holdings Inc. (“LBHI”), as Plan Administrator pursuant to the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors, for LBHI and certain of its subsidiaries (collectively, the “Debtors”), and Plaza Home Mortgage Inc. (the “Objector” and together with the Debtors, the “Parties”).

**RECITALS**

WHEREAS, on May 29, 2014, LBHI filed the Motion for Alternative Dispute Resolution Procedures Order for Indemnification Claims of the Debtors Against Mortgage Loan Sellers [Dkt. No. 44450] (the “Motion”);

WHEREAS, on June 12, 2014, the Objector filed an objection to the Motion [Dkt. No. 44674] (the “Objection”);

WHEREAS, a hearing on the motion is scheduled for June 19, 2014 at 10:00 a.m. (the “Hearing Date”);

WHEREAS, the Parties wish to adjourn the Hearing Date with respect to the Objection as well as the Motion’s application to the Objector, until the next regularly scheduled omnibus hearing date in these cases in accordance with the Case Management Procedures Order [Dkt. No.

9635] and the Eighteenth Notice of Establishment of Combined Omnibus and Claims Hearing Dates [Dkt. No. 44174], or such other date as the Court may direct;

WHEREAS, LBHI intends to move forward with the Motion against parties not subject to this Stipulation at the Hearing Date;

NOW, THEREFORE, IT IS STIPULATED AND AGREED AS FOLLOWS:

1. The Hearing Date for the Motion solely with respect to the Objector and the Objection is adjourned until **July 16, 2014, at 10:00 a.m. (Eastern)**.
2. This Stipulation is without prejudice, and the Parties expressly reserve any and all rights, defenses, remedies, and claims that they may hold with respect to the Motion and the Objection. Any decision, judgment or order entered on the Motion by the Court prior to the Hearing Date on the Objection shall not have any res judicata or collateral estoppel effect as to the Objection.
3. Nothing herein shall affect LBHI's right to prosecute the Motion as to all other parties not subject to this Stipulation.

Dated: New York, New York  
June 18, 2014

Dated: New York, New York  
June 18, 2014

WOLLMUTH MAHER & DEUTSCH LLP

MAYER BROWN LLP

By: /s/James N. Lawlor  
James N. Lawlor  
Adam M. Bialek

By: /s/Joaquin M. C de Baca  
Michael O. Ware  
Joaquin M. C de Baca

500 Fifth Avenue  
New York, New York 10110  
Tel: (212) 382-3300  
Fax: (212) 382-0050

1675 Broadway  
New York, New York 10019  
Tel: (212) 506-2500  
Fax: (212) 262-1910

*Special Counsel for Debtors*

*Counsel for Objector*

**IT IS SO-ORDERED:**

June 19, 2014  
New York, New York

/s/ Shelley C. Chapman  
HONORABLE SHELLEY C. CHAPMAN  
UNITED STATES BANKRUPTCY JUDGE